

**TECHNICAL REVIEW AND EVALUATION FOR SIGNIFICANT REVISION #45569  
TO  
OPERATING AIR QUALITY PERMIT #29037  
TRANSWESTERN PIPELINE COMPANY, LLC-Kingman Compressor Station**

**I. INTRODUCTION**

This Class I Significant Revision to Operating Permit No. 29037 is being issued to Transwestern Pipeline Company, the Permittee, for the revision of sulfur monitoring requirements in the current permit resulting from changes promulgated under 40 CFR 60 Subpart GG. The revision also incorporates changes in the permit due to deletion of emergency generator (519 hp) and heater (1.0 MMBtu/hr)

**A. Company Information**

Facility Name: Transwestern Pipeline Company, LLC

Mailing Address: 711 Louisiana St., Suite 900  
Houston, TX 77002

Facility Address: 40 miles east of Kingman on I-40,  
Kingman, Mohave County, Arizona 86401

**B. Attainment Classification**

The source is located in an area that is in attainment or unclassified for all criteria pollutants.

**C. Learning Sites Evaluation**

There are no learning sites within 2 miles of the facility.

**II. DESCRIPTION**

The current permit (Permit No. 29037) requires the Permittee to conduct fuel sulfur testing using ASTM methods once every six months. Changes to 40 CFR 60 Subpart GG promulgated on July 8, 2004, however, provide the option of not conducting periodic tests and compliance demonstration by maintaining documentation for sulfur content of fuel. 40 CFR 60.334(h)(3) states that:

“Notwithstanding the provisions of paragraph (h)(1) of this section, the owner or operator may elect not to monitor the total sulfur content of the gaseous fuel combusted in the turbine, if the gaseous fuel is demonstrated to meet the definition of natural gas in §60.331(u), regardless of whether an existing custom schedule approved by the administrator for subpart GG requires such monitoring. The owner or operator shall use one of the following sources of information to make the required demonstration:

- (i) The gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20.0 grains/100 scf or less; or
- (ii) Representative fuel sampling data which show that the sulfur content of the gaseous fuel does not exceed 20 grains/100 scf. At a minimum, the amount of fuel sampling data specified in section 2.3.1.4 or 2.3.2.4 of appendix D to part 75 of this chapter is required.”

## DRAFT

The Permittee has, therefore, requested for the revision in monitoring requirements for sulfur content in fuel.

Consequently, through this significant revision, following changes are proposed to be incorporated in the permit:

1. Condition II.D.2 for fuel sulfur Monitoring and Record Keeping Requirements is proposed to be revised as:  
“The Permittee shall demonstrate that the gaseous fuel burned in the gas turbine meets the definition of “natural gas” in 40 CFR 60.331(u) by maintaining a current, valid purchase contract, tariff sheet, or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20 grains/100 scf or less.”
2. Conditions III.B.2, III.C, III.D.2.c and III.E.2.a pertaining to emergency diesel generator and Section IV pertaining to heater are proposed to be deleted.

### III. EMISSIONS

The revision will not result in any increase in emissions from the facility.

### IV. APPLICABLE REQUIREMENTS

Consequent to changes to 40 CFR 60 Subpart GG promulgated on July 8, 2004, the monitoring requirements for fuel sulfur monitoring are being revised. The Permittee will now be subject to monitoring requirements under 40 CFR 60.334(h)(3). This a substantive change in the monitoring requirements, and thus, in accordance with Arizona Administrative Code (A.A.C.) 18-2-319-A.2, this change cannot be permitted as a minor permit revision. Therefore, this revision is considered a significant permit revision.

### V. MONITORING, RECORDKEEPING AND REPORTING REQUIREMENTS

The current permit (Permit No. 29037) requires the Permittee to conduct fuel sulfur testing using ASTM methods once every six months. Consequent to this permit revision, the Permittee is now required to demonstrate compliance by maintaining a current, valid purchase contract, tariff sheet, or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20 grains/100 scf or less.

### VI. LIST OF ABBREVIATIONS

A.A.C. .... Arizona Administrative Code  
ADEQ .....Arizona Department of Environmental Quality  
EPA .....Environmental Protection Agency  
CFR..... Code of Federal Regulations  
ASTM .....American Society for Testing & Materials